

From Cara Campbell <clc@slashconsumption.com>  
to Paul Williams <Paul.Williams@swfwmd.state.fl.us>  
cc Marti Moore <Martha.Moore@swfwmd.state.fl.us>,  
Pam Gifford <Pamela.Gifford@swfwmd.state.fl.us>,  
Steve Desmith <Steve.Desmith@swfwmd.state.fl.us>  
Date Fri, Nov 5, 2010 at 6:45 PM  
subject Re: Levy Nuclear Plant Permit

Mr. Williams,

Thank you so much. You don't know how much this helps me!! The GWBRAI is something I came across in the Levy County Comprehensive plan. Here is what it says:

The task of identifying the nature and extent of groundwater resources available within the state has been delegated to the regional water management districts. Each district must prepare and make available to local governments a [Groundwater Basin Resource Availability Inventory \[GWBRAI\]](#), which the local governments are to use to plan for future development in a manner which reflects the limits of available resources.

The criteria for the inventories, and legislative intent for their use, are found in Chapter 373, Florida Statutes, which reads:

"Each water management district shall develop a [groundwater basin resource availability inventory](#) covering those areas deemed appropriate by the governing board. This inventory shall include, but not be limited to, the following:

1. A hydro geologic study to define the groundwater basin and its associated recharge areas.
2. Site specific areas in the basin deemed prone to contamination or overdraft resulting from current or projected development.
3. Prime groundwater areas.
4. Criteria to establish minimum seasonal surface and groundwater basin.
5. Areas suitable for future water resource development within the groundwater basin.
6. Existing sources of wastewater discharge suitable for re-use as well as the feasibility of integrating coastal wellfields.
7. Potential quantities of water available for consumptive uses.

So I was just wondering if this has been completed for Levy.

Again, thanks!!  
Cara

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On Nov 5, 2010, at 5:10 PM, Paul Williams wrote:

Cara, Sorry this took so long...I drafted it then moved on to something else before I sent it.

What is the name of the primary reviewer of the LNP? When was the groundwater model last reviewed? Robert Jaques was the initial primary reviewer. . I believe that both Robert Jaques and I reviewed the most recent modeling in August thru October 2008.

Where might I find SWFWMD data for daily rainfall- including where the collection sites are and the frequency of collection? All of the Districts rainfall data collection stations were included in the web site reference I sent you. You can access our data collection system through our web site on-line to get any data we collect. Contact Steve Desmith if you have additional questions regarding resource data at his email address as above. I recommend trying the national weather service or NOAA for additional information.

If there are any other organizations whose daily rainfall data the District uses, do you have the site information and collection frequency for them or can you tell me how to contact them? See above.

Has a Groundwater Basin Resource Availability Inventory been done for Levy County? I am not sure what this is? The District and applicants use the District Wide Regulation Model (DWRM) for making permitting decisions for groundwater withdrawals. The DWRM model was used for permitting this use. In addition, the District uses another groundwater model known as the Northern District Model for making long term planning resource evaluations.

Paul Williams

Paul M. Williams, P.G. CPG  
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**From:** Cara Campbell [<mailto:clc@slashconsumption.com>]  
**Sent:** Friday, November 05, 2010 1:29 PM  
**To:** Paul Williams  
**Subject:** Levy Nuclear Plant Permit

Hi, Mr. Williams,

I left you a voice mail but am following up with this e-mail. I don't know if this e-mail below was lost or maybe your response didn't make it to me somehow. Anyway, I would be grateful for a response to the questions below:

What is the name of the primary reviewer of the LNP? When was the groundwater model last reviewed?

Where might I find SWFWMD data for daily rainfall- including where the collection sites are and the frequency of collection?

If there are any other other organizations whose daily rainfall data the District uses, do you have the site information and collection frequency for them or can you tell me how to contact them?

Has a Groundwater Basin Resource Availability Inventory been done for Levy County?

Thank you so much for your help which I really appreciate since it is impossible for me to come up to Brooksville,

Cara

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**From:** Cara Campbell <[clc@slashconsumption.com](mailto:clc@slashconsumption.com)>  
**Date:** October 21, 2010 5:39:35 PM EDT  
**To:** Paul Williams <[Paul.Williams@swfwmd.state.fl.us](mailto:Paul.Williams@swfwmd.state.fl.us)>  
**Subject: Re: Levy Nuclear Plant Permit**

Hi, Mr. Williams

Thank you again for your prompt help. I do have a few further questions based on your answers. Would you be so kind as to tell me the name of the primary reviewer who is no longer with SWFWMD?

Can you please tell me when the last model review was performed & the name of the reviewer? I am unable to come up there to examine the file and would be so grateful if you could let me know.

Thanks again,

Cara

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On Oct 19, 2010, at 12:42 PM, Paul Williams wrote:

Ms. Campbell, Brief answers to your questions follow. Please note that I was not the primary reviewer, he is no longer with the District so I will answer your questions as best as I can. My responses are in red.

Would you be so kind as to send me a link where I can download a copy of that Wetland Assessment Procedure?

<http://www.swfwmd.state.fl.us/search/results.php?q=wap&cx=001038397238880780433%3A6zzetjace3k&cof=FORID%3A11#1075>

Also, what are the performance review standards applicable to the Environmental Monitoring Plan? **Section B4-1 and B4-2 of the Districts Basis of Review.** [http://www.swfwmd.state.fl.us/files/database/site\\_file\\_sets/14/WUP\\_Basis\\_of\\_Review-20-year\\_permit-2007086\\_eff\\_063010.pdf](http://www.swfwmd.state.fl.us/files/database/site_file_sets/14/WUP_Basis_of_Review-20-year_permit-2007086_eff_063010.pdf)

Has PEF submitted the Water Monitoring Plan referenced in the Conditions for Certification? **From the COC's "An Environmental Monitoring Plan (EMP) shall be submitted no less than 3 years prior to any production well use in excess of 100,000 gallons per day (annual average) for production purposes. The EMP shall be approved and implemented a minimum of one-year prior to initial use of the first production well in excess of 100,000 gallons per day (annual average) for production purposes."**

The EMP has not been submitted yet.

Did you provide the Conditions for Certification? DEP writes the COC's however SWFWMD contributed to the COC's that pertain to groundwater use.

If you did, did you use the original groundwater modeling data submitted by the applicant or did you use the revised, "recalibrated" model that the applicant completed after the initial review process was completed? We used the most recent modeling information as the final impact analysis

If you reviewed the re-calibrated model, can you tell me when that re-calibrated model was submitted and reviewed and how the re-calibrated model was reviewed? This information is available in the File of Record. The model was evaluated using Groundwater Vistas software.

I also have a few more general questions.

Can you send me a map showing where the District's rainfall collection sites are located for Levy County? The District web site rainfall site list is contained here: <http://www.swfwmd.state.fl.us/data/wmdbweb/files/actrnf.pdf>

Could you also please tell me where to find the report of the minimum aquifer levels that the District established in Levy County? The District has not established any minimum aquifer levels in Levy County,

Finally, can you give me a link to download the rules governing the environmental impacts of groundwater permits and Rule 40-D FAC? District Rules are available on our web site as follows: <http://www.swfwmd.state.fl.us/permits/wup/>

I hope these answers are satisfactory. Please note that there is a great deal of information on the Districts web site that pertains to our Rules for water use. I have referenced some of that information however you will be able to find more as you may need.

Paul Williams

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**From:** Cara Campbell [<mailto:clc@slashconsumption.com>]

**Sent:** Monday, October 18, 2010 4:56 PM

**To:** Paul Williams

**Subject:** Levy Nuclear Plant Permit

Hi, Mr. Williams,

Ms. Gifford has been assisting me with some documents related to the Site Certification process for the proposed Levy nuclear plant.

I have some questions about the groundwater use conditions for the proposed Levy nuclear plant and I understand that you were the person who reviewed that application.

One of the Conditions for Certification states:

The monitoring plan, at a minimum shall utilize the District's Wetland Assessment Procedure to evaluate the relative condition of surface waters and wetlands in areas potentially affected by water withdrawals of Licensee.

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Would you be so kind as to send me a link where I can download a copy of that Wetland Assessment Procedure?

Also, what are the performance review standards applicable to the Environmental Monitoring Plan?

Has PEF submitted the Water Monitoring Plan referenced in the Conditions for Certification?

Did you provide the Conditions for Certification?

If you did, did you use the original groundwater modeling data submitted by the applicant or did you use the revised, "recalibrated" model that the applicant completed after the initial review process was completed?

If you reviewed the re-calibrated model, can you tell me when that re-calibrated model was submitted and reviewed and how the re-calibrated model was reviewed?

I also have a few more general questions.

Can you send me a map showing where the District's rainfall collection sites are located for Levy County?

Could you also please tell me where to find the report of the minimum aquifer levels that the District established in Levy County?

Finally, can you give me a link to download the rules governing the environmental impacts of groundwater permits and Rule 40-D FAC?

Thank you, Mr. Williams, for your help.

Cara Campbell